

State of California
Regional Water Quality Control Board
San Diego Region

SUPPLEMENTAL
EXECUTIVE OFFICER SUMMARY REPORT
July 14, 2010

ITEM: 9

SUBJECT: Approval of the Hydromodification Management Plan (HMP) for the County of San Diego, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority (Tentative Resolution No. R9-2010-0066) (Christina Arias)

DISCUSSION: HMP Monitoring Plan Revisions
As discussed in July's Executive Officer Summary Report, the Copermittee's submitted an Executive Summary of a revised HMP Monitoring Plan dated June 30, 2010 (Supporting Document 8). The San Diego Water Board made further revisions via an Errata Sheet to Tentative Resolution No. R9-2010-0066 (Supporting Document 10).

Copermittee's Revised Monitoring Plan

The original Monitoring Plan included in the Copermittees' HMP dated December 29, 2009 failed to meet the requirement to "...assess the effectiveness of implementation of the HMP" (Provision D.1.g (1)(k) of Order No. R9-2007-0001). On June 9, 2010, at the direction of the San Diego Water Board, Southern Watershed Unit staff met with interested stakeholders to discuss the HMP Monitoring Plan. A follow-up meeting was held on June 23, 2010. As a direct result of these discussions, on June 30, 2010, the Copermittees submitted an Executive Summary of a revised Monitoring Plan. The revised Monitoring Plan is much improved over the original submittal because it contains specific study questions and a multi-pronged experimental design that will allow the Copermittees to better assess the effectiveness of their program.

San Diego Water Board Revisions to Monitoring Plan

Although much improved, the revised Monitoring Plan dated June 30, 2010 still falls short of the requirement to "...include mechanisms for addressing cumulative impacts within a

watershed on channel morphology” (Provision D.1.g.(1)(l) of Order No. R9-2007-0001). Therefore, Tentative Resolution No. R9-2010-0066 has been revised to include limited pre-project receiving water data collection downstream of all PDPs subject to the HMP requirements. This revision would facilitate the Copermittees in meeting this permit requirement.

The HMP dated December 29, 2009 allows project applicants to assess the susceptibility of the downstream creek, which in turn determines which best management practice (BMP) threshold they can use. For example, a highly stable creek segment indicates a project applicant may use a more relaxed BMP standard than if the creek were only moderately stable. Where a project applicant does not wish to use the most restrictive BMP, the applicant must perform an in-depth geomorphic creek assessment involving several field measurements and analyses. Where a project applicant opts to use the most restrictive BMP threshold, there is no requirement to perform a geomorphic assessment on the downstream creek. In this situation, there would be no information collected on downstream receiving waters, which would be useful to Copermittees for assessing and addressing cumulative impacts.

Tentative Resolution No. R9-2010-0066 adds a limited data collection requirement to all PDPs subject to the HMP requirements, including those where the full-blown pre-project creek geomorphic assessment is not required by the HMP. The pre-project creek data collection requirements for all PDPs subject to the HMP requirements are to: 1) include photo documentation of at least one location of the receiving water immediately downstream of the PDP, 2) include a cross-section measurement of that same location(s) to provide scale for the photos, and 3) include global positioning system (GPS) coordinates for that same location(s).

By including this information, the Copermittees will have photo documentation of receiving waters over time that will be useful in assessing and addressing cumulative impacts from multiple sources that would otherwise go unnoticed. The changes described above are included in the Errata Sheet dated July 9, 2010 (Supporting Document 10).

Public Comments

In response to the Copermittees' revised Monitoring Plan dated June 30, 2010, San Diego Coastkeeper and Natural Resources Defense Council submitted comments (Supporting Document 11). The comment letter acknowledges the improvements made to the Monitoring Plan but recommends adding monitoring stations downstream in the watersheds in addition to the ones proposed by the Copermittees. The recommendation was made so that effects from implementation of the HMP could be monitored in developed areas in the lower watershed areas as well as upper watershed areas, and also to correct the need to address cumulative impacts as described above.

ADDITIONAL
SUPPORTING
DOCUMENTS:

(Supporting Documents 1-9 have already been provided to San Diego Water Board Members and are not included here.) Supporting Documents 10 and 11 are new material and included for reference.

1. Tentative Resolution No. R9-2010-0066
2. Hydromodification Management Plan dated December 29, 2009
3. Letter to Interested Persons dated April 7, 2010
4. Letter from San Diego Water Board to Lead Copermittee dated June 29, 2010
5. Comment Letters Received by May 10, 2010
 - a) Sierra Club
 - b) San Diego Coastkeeper/Natural Resources Defense Council
 - c) County of San Diego
 - d) City of Vista
 - e) City of Chula Vista
 - f) City of Encinitas
 - g) City of Santee
 - h) City of Poway
 - i) City of La Mesa
 - j) City of Imperial Beach
6. Response to Comments
7. Comment Letters Received after May 10, 2010
 - a) City of El Cajon
 - b) City of Del Mar
 - c) City of Lemon Grove
 - d) City of San Marcos
 - e) City of Oceanside

8. Revised HMP Monitoring Plan Executive Summary dated June 30, 2010
9. List of Reference Materials submitted into the record on June 9, 2010 from San Diego Coastkeeper and Natural Resources Defense Council. CDs containing Reference Materials are available to Interested Persons upon request.
10. Errata Sheet dated July 9, 2010
11. Comment Letter from San Diego Coastkeeper and Natural Resources Defense Council dated July 2, 2010.

RECOMMENDATION(S): Adopt Tentative Resolution No. R9-2010-0066 with Errata.